

**FILED**

APR 16 2015

SECRETARY, BOARD OF  
OIL, GAS & MINING

**BEFORE THE BOARD OF OIL, GAS AND MINING  
DEPARTMENT OF NATURAL RESOURCES  
STATE OF UTAH**

IN THE MATTER OF THE REQUEST FOR AGENCY ACTION OF BILL BARRETT CORPORATION FOR AN ORDER POOLING ALL INTERESTS, INCLUDING THE COMPULSORY POOLING OF THE INTERESTS OF CERTAIN NON-CONSENTING OR UNLOCATABLE OWNERS, IN SPECIAL DRILLING UNIT #27, ESTABLISHED FOR THE PRODUCTION OF OIL, GAS AND ASSOCIATED HYDROCARBONS FROM THE LOWER GREEN RIVER-WASATCH FORMATIONS, COMPRISED OF LOTS 6-9 OF SECTION 27 AND LOT 2 OF SECTION 34, TOWNSHIP 6 SOUTH, RANGE 19 EAST, SLM, AND LOT 1, S½, E½NW¼, W½NE¼ AND SE¼NE¼ OF SECTION 33 AND LOTS 1-3 OF SECTION 34, TOWNSHIP 2 SOUTH, RANGE 2 EAST, USM, UINTAH COUNTY, UTAH

**ERRATA TO REQUEST FOR  
AGENCY ACTION**

Docket No. 2015-018

Cause No. 139-132

Bill Barrett Corporation, acting by and through its attorneys, MacDonald & Miller Mineral Legal Services, PLLC, and hereby respectfully submits this Errata to its Request for Agency Action filed on April 10, 2015 in this Cause (the "RAA"). Specifically, this Errata is intended to correct the following typographical errors contained in the RAA as originally filed:

- Pg. 2 – "William Keefe" should be "William Keefer";
- Pg. 8, ¶ 10 – "William Keefe" should be "William Keefer"; and

- Pg. 10, ¶ 14 – “William Keefe” should be “William Keefer”.

Correction pages are attached hereto and the Board Secretary is respectfully requested to discard the original pages identified above and substitute the attached in lieu thereof, and to include this Errata as part of the electronic file in this Cause available to the general public. Service of the RAA is being effectuated with these corrections.

Dated this 16<sup>th</sup> day of April, 2015.

**MACDONALD & MILLER  
MINERAL LEGAL SERVICES, PLLC**

By: 

Frederick M. MacDonald, Esq.

Attorneys for Petitioner Bill Barrett Corporation

“139-106 Order”) (the 131-27, 139-42 and 139-106 Orders collectively hereinafter the “Applicable Orders”), for the production of oil, gas and associated hydrocarbons from the Lower Green River-Wasatch formations, defined as:

that interval below the stratigraphic equivalent of 9,600 feet depth in the “E” Log of the Carter #2 Bluebell well located in the SW $\frac{1}{4}$ NW $\frac{1}{4}$ , Section 3 Township 1 South, Range 2 West, U.S.M. (which equivalence is the depth 9,530 feet of the SP curve, Dual Induction Log, run March 15, 1968, in the Chevron #1 Blanchard well located in the NW $\frac{1}{4}$ SE $\frac{1}{4}$  of said [Section 3]), to the base of the Green River-Wasatch formations,

(the “Subject Formations”), comprised of Lots 6 (7.69 acres), 7 (39.99 acres), 8 (30.98 acres) and 9 (14.17 acres) of Section 27, and Lot 2 (0.99 acres) [All] of Section 34, Township 6 South, Range 19 East, SLM, and Lot 1 (32.65 acres), S $\frac{1}{2}$ , E $\frac{1}{2}$ NW $\frac{1}{4}$ , W $\frac{1}{2}$ NE $\frac{1}{4}$  and SE $\frac{1}{4}$ NE $\frac{1}{4}$  of Section 33, and Lots 1 (8.44 acres), Lot 2 (26.78 acres) and Lot 3 (43.06 acres) [All] of Section 34, Township 2 South, Range 2 East, USM, Uintah County, Utah (the “Drilling Unit”). This Request includes the compulsory pooling of the interests of the following parties:

Jerry L. Brown, Successor Administrator  
of the Estate of Charles E. Ackerman

William Keefer

Brian Jones

Wells Fargo Bank, N.A.  
(formerly First Interstate Bank of Utah,  
N.A.),  
Trustee of the Robert J. Cook Trust (the  
“Cook Trust”)

Bradley Sholl

Brian Sholl

the lessor's prior written consent. Such written consent has not yet been received by BBC.

5. Transcontinental, Kenai, Tamarack and Gracechurch collectively own a lease covering 2.099385% of the oil and gas in Tract 4. However, their interests have not been voluntarily pooled.

6. Jerry L. Brown, as Successor Administrator of the Estate of Charles E. Ackerman, owns an unleased undivided 0.010497% interest in Tract 4. However, his interest has not yet been voluntarily pooled.

7. William Keefer and Brian Jones each purport to claim an unleased undivided 0.000262% interest in Tract 4 through the Estate of Gertrude Featherstone. However, their interests have not been voluntarily pooled.

8. The Cook Trust owns an unleased undivided 0.005248% interest in Tract 4. However, its interest has not been voluntarily pooled.

9. Margaret Collins Robertson and Jeanne Collins each purport to claim an unleased undivided 0.002099% interest in Tract 4 through the Estate of Mrs. W. E. Block, a/k/a Margaret Miller Block. However, their interests have not been voluntarily pooled.

10. John B. Janssen purports to claim an unleased undivided 0.000070% interest, Robert Janssen and Aaron Janssen each purport to claim an unleased undivided

motion to provide the Unknowns with their written opportunity to lease or participate in the Subject Wells and of this Request and hearing thereon by publication.

12. Pursuant to the holding in *Cowling v. Board of Oil, Gas and Mining*, 830 P.2d 220, 226 (Utah 1991), the Applicable Orders established, upon their respective entry, the parties' correlative rights to production from any well located on the Drilling Unit.

13. Commencing in January 2013, BBC, through its contracted brokers, conducted good faith negotiations for the leasing or participation of the Cook Trust's interest. The Cook Trust has been unresponsive, claiming it has insufficient records to confirm any ownership. By Letters dated October 2, 2014 and November 14, 2014 sent certified mail, return receipt requested, BBC provided the Cook Trust with a final offer to lease or participate in each of the Subject Wells as an unleased working interest owner, with enclosed authorities for expenditure ("AFE's") and a proposed JOA. No response was ever received.

14. Commencing in June 2013, BBC, through its contracted brokers, conducted good faith negotiations for the leasing or participation of the interests of William Keefer and Brian Jones. Both parties informed BBC's broker that they "wanted nothing to do with the interests." By Letters dated October 2, 2014 and November 14, 2014 sent certified mail, return receipt requested, BBC provided Messrs. Keefer and Jones with a